

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NICOLE JENNINGS WADE,)	
JONATHAN D. GRUNBERG, and)	
G. TAYLOR WILSON)	
)	
Plaintiffs,)	
)	CIVIL ACTION
v.)	
)	
L. LIN WOOD,)	FILE NO. 1:22-CV-01073
)	
Defendant.)	
_____)	

**DEFENDANT’S RESPONSES TO PLAINTIFFS’ FIRST REQUEST FOR
ADMISSIONS**

COMES NOW, Defendant L. LIN WOOD, and responds to Plaintiffs’ First Request for Admissions as follows:

1.

Defendant admits the averments contained in paragraph 1 of Plaintiffs’ Request for Admissions.

2.

Defendant admits the averments contained in paragraph 2 of Plaintiffs’ Request for Admissions.

3.

Defendant admits the averments contained in paragraph 3 of Plaintiffs’

Request for Admissions.

4.

Defendant admits the averments contained in paragraph 4 of Plaintiffs' Request for Admissions.

5.

Defendant admits the averments contained in paragraph 5 of Plaintiffs' Request for Admissions.

6.

Defendant admits the averments contained in paragraph 6 of Plaintiffs' Request for Admissions.

7.

Defendant admits the averments contained in paragraph 7 of Plaintiffs' Request for Admissions.

8.

Defendant admits the averments contained in paragraph 8 of Plaintiffs' Request for Admissions.

9.

Defendant admits the averments contained in paragraph 9 of Plaintiffs' Request for Admissions.

10.

Defendant admits the averments contained in paragraph 10 of Plaintiffs' Request for Admissions.

11.

Defendant admits the averments contained in paragraph 11 of Plaintiffs' Request for Admissions.

12.

Defendant admits the averments contained in paragraph 12 of Plaintiffs' Request for Admissions.

13.

Defendant admits the averments contained in paragraph 13 of Plaintiffs' Request for Admissions.

14.

Defendant admits the averments contained in paragraph 14 of Plaintiffs' Request for Admissions.

15.

Defendant admits the averments contained in paragraph 15 of Plaintiffs' Request for Admissions.

16.

Defendant admits the averments contained in paragraph 16 of Plaintiffs'

Request for Admissions.

17.

Defendant admits the averments contained in paragraph 17 of Plaintiffs' Request for Admissions.

18.

Defendant admits the averments contained in paragraph 18 of Plaintiffs' Request for Admissions.

19.

Defendant admits the averments contained in paragraph 19 of Plaintiffs' Request for Admissions.

20.

Defendant admits the averments contained in paragraph 20 of Plaintiffs' Request for Admissions.

21.

Defendant admits the averments contained in paragraph 21 of Plaintiffs' Request for Admissions.

22.

Defendant admits the averments contained in paragraph 22 of Plaintiffs' Request for Admissions.

23.

Defendant admits the averments contained in paragraph 23 of Plaintiffs' Request for Admissions.

24.

Defendant admits the averments contained in paragraph 24 of Plaintiffs' Request for Admissions.

25.

Defendant admits the averments contained in paragraph 25 of Plaintiffs' Request for Admissions.

26.

Defendant admits the averments contained in paragraph 26 of Plaintiffs' Request for Admissions.

27.

Defendant admits the averments contained in paragraph 27 of Plaintiffs' Request for Admissions.

28.

Defendant admits the averments contained in paragraph 28 of Plaintiffs' Request for Admissions.

29.

Defendant admits the averments contained in paragraph 29 of Plaintiffs'

Request for Admissions.

30.

Defendant admits the averments contained in paragraph 30 of Plaintiffs' Request for Admissions.

31.

Defendant admits the averments contained in paragraph 31 of Plaintiffs' Request for Admissions.

32.

Defendant admits the averments contained in paragraph 32 of Plaintiffs' Request for Admissions.

33.

Defendant admits the averments contained in paragraph 33 of Plaintiffs' Request for Admissions.

34.

Defendant denies the averments contained in paragraph 34 of Plaintiffs' Request for Admissions.

35.

Defendant denies the averments contained in paragraph 35 of Plaintiffs' Request for Admissions.

36.

Defendant admits the averments contained in paragraph 36 of Plaintiffs' Request for Admissions.

37.

Defendant admits the averments contained in paragraph 37 of Plaintiffs' Request for Admissions.

38.

Defendant admits the averments contained in paragraph 38 of Plaintiffs' Request for Admissions.

39.

Defendant admits the averments contained in paragraph 39 of Plaintiffs' Request for Admissions.

40.

Defendant admits the averments contained in paragraph 40 of Plaintiffs' Request for Admissions.

41.

Defendant admits the averments contained in paragraph 41 of Plaintiffs' Request for Admissions.

42.

Defendant admits the averments contained in paragraph 42 of Plaintiffs'

Request for Admissions.

43.

Defendant admits the averments contained in paragraph 43 of Plaintiffs'

Request for Admissions.

44.

Defendant admits the averments contained in paragraph 44 of Plaintiffs'

Request for Admissions.

This 31st day of August, 2022.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ R. CHRISTOPHER HARRISON
R. CHRISTOPHER HARRISON
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By: /s/ L. LIN WOOD

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the Northern District of Georgia, I hereby certify that this pleading has been prepared in compliance with Local Rule 5.1(C) using 14-point Times New Roman Font.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ R. Christopher Harrison
R. CHRISTOPHER HARRISON
Georgia State Bar No. 333199
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Attorneys for Defendant

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Andrew M. Beal, Esq.
Milinda Brown, Esq.
Buckley Beal LLP
600 Peachtree Street, NE
Suite 3900
Atlanta, GA 30308

This 31st day of August, 2022.

DOWNEY & CLEVELAND, LLP

By: /s/ R. Christopher Harrison
R. CHRISTOPHER HARRISON
Georgia State Bar No. 333199